

ADDITIONAL INFORMATION

Received after August 12, 2016

**East Tennessee Health Care Holdings,
LLC**

CN1605-021

August 15, 2016

VIA HAND DELIVERY

Melanie M. Hill
Executive Director
Tennessee Health Services and
Development Agency
Andrew Jackson Building, 9th Floor
502 Deaderick Street
Nashville, TN 37243

RE: East Tennessee Healthcare Holdings, Inc., CN1605-021

Dear Ms. Hill:

This letter is submitted on behalf of the above application for the purpose of providing additional information related to an issue raised by opponents to the project.

We understand that some members of the community have expressed opposition to the location of the proposed facility. On August 9, 2016, the Johnson City Planning Commission voted to approve the zoning required for the facility. In connection with the Planning Commission review, the Johnson City Development Services Department conducted research and evaluated the proposal. The result of the Department's work is summarized in the enclosed memorandum. Key points in the memorandum include the following:

- Even though the proposed facility will be different from typical methadone clinics, the staff assumed a "worst case approach" and evaluated the facility as if it were like any other methadone clinic.
- Based on discussions with law enforcement officials from other Tennessee communities where methadone clinics are located (Memphis, Knoxville, Columbia and Dyersburg), the report notes there are few, if any, issues associated with the clinics. The report points out that some of the other clinics had opposition to the location, "but the concerns have not come to pass."
- The city Traffic Engineer evaluated potential traffic issues and concluded that the proposed facility would have "no significant impact."

*The Pinnacle at Symphony Place
150 3rd Avenue South, Suite 1600
Nashville, TN 37201*

DAN H. ELROD
615.651.6702
dan.elrod@butlersnow.com

T 615.651.6700
F 615.651.6701
www.butlersnow.com

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- The proximity of the location to schools and residents was evaluated. The report notes that alternative sites are in close proximity to 4 to 6 times more houses and that other alternatives have similar proximity to schools.

I am submitting twenty (20) copies of this letter and the report in order to facilitate distribution to Agency members. Please let me know if you have any question regarding this submission.

Very truly yours,

BUTLER SNOW LLP



Dan H. Elrod

clw
Enclosures




Development Services Department

Administration • Codes • Planning
Community Development • GIS • MTPO

PLANNING DIVISION

DATE: July 7, 2016

TO: M. Denis Peterson, City Manager
Johnson City Board of Commissioners
Johnson City Regional Planning Commission

FROM: Steve Neilson, Development Coordinator 

SUBJECT: Impacts of methadone treatment clinics

At a recent Gray neighborhood meeting for the proposed ETSU-MSHA outpatient treatment center, Gray residents expressed concerns about the project. They referred to the proposed facility as a methadone clinic and insisted that it would increase crime and be a high traffic generator which would create a negative impact in the Gray area. While these are important issues to the residents, their concerns are unfounded.

First, an important fact to point out is that the ETSU-MSHA facility will be a not-for-profit holistic treatment center where methadone treatment will be only one component. There will be other treatments available including abstinence. However, because there is no real data for this specific type of facility, staff is taking a worst case approach and reviewing this as if it was a for-profit methadone treatment clinic.

Crime

There is no evidence that there is an increase in crime due to a methadone clinic locating in a community/neighborhood. To verify this, Chief Mark Sirois called police officials in four Tennessee communities which have methadone clinics to find if there has been any increase in crime or other negative impacts associated with these clinics. Chief Sirois indicated that he spoke with officials from Memphis, Knoxville, Columbia, and Dyersburg who informed him that there is little, if any, crime spillage from these clinic sites.

These observations are supported by a 2012 University of Maryland Study: Use of a 'microecological technique' to study crime incidents around methadone maintenance treatment centers, which found also no significant increase in crime associated with methadone treatment centers.

*"The Johnson City Development Services Department is committed to
a comprehensive approach to guide and shape quality development in our region."*

Traffic

Staff believes that the traffic pattern will be more in line with the typical medical office use than a methadone clinic. A for-profit methadone clinic will generate approximately three times the traffic of a typical medical office use. Staff found that even if the proposed clinic is treated like a methadone clinic, the overall traffic impact of the proposed clinic is not significant enough to reduce the level of service of Suncrest Drive. Anthony Todd, Traffic Engineer evaluated traffic volumes along Suncrest Drive, shift changes at TPI, the impact of area schools, and the anticipated traffic characteristics of the proposed clinic and found no significant impact.

The hours of operation for a methadone clinic are generally between 5:00 a.m. and 10:00 a.m., therefore, the clinic's peak traffic volume would be higher in the a.m. and have little or no impact in the p.m. when the peak traffic volume along Suncrest Dr. is normally highest and experiences the greatest congestion. For comparison purposes, Mr. Todd states the proposed clinic would generate approximately half the traffic of a typical fast food restaurant or one-fifth of the traffic generated by a coffee/donut shop during the a.m. peak.

Location to School and Residents

Gray residents state that the Gray Commons site is also a bad location for a methadone clinic because there are three schools and several hundred homes nearby. They state that there are other sites that are more appropriate and specifically identified the following three locations:

- Innovation Park (near the intersection of W. Market St. and State of Franklin Rd.)
- Med-Tech Park (off of State of Franklin Road)
- The site of the former Northside Hospital (off Princeton Rd.)

When evaluating the number of residential dwellings within a ½ mile, the number of residential dwellings of all three of the alternative sites exceed the Gray Commons site. In fact, the Innovation Park site has more than three times the residential dwellings of the Gray Commons site. At one mile, the number of residential dwellings of all three alternative sites greatly exceed the Gray Commons property by a factor of 4 to 6 times the number of dwelling units.

Number of Residential Dwellings

Sites	Number of Residential Dwellings	
	1/2 Mile	1 Mile
Gray Commons	217	586
Innovation Park	686	3,392
Med-Tech Park	288	2,415
Northside Hospital Site	360	2,264

Gray residents also expressed that this was not a good location because there were too many schools nearby. There are three schools within two miles driving distance from the currently proposed site. After reviewing the alternative sites, staff found that each site also had three or more schools within similar proximity.

Sites	Distance to Schools		
	Name	Straight-line	Roadway
Gray Commons			
	Daniel Boone High School	1.31 mi.	1.36 mi.
	Ridgeway Elementary	0.95 mi.	1.67 mi.
	Gray Elementary	1.48. mi.	1.93. mi.
Innovation Park			
	University School	1.2 mi.	1.75 mi.
	Woodland Elementary	1.28 mi.	1.85 mi.
	Alternative. Learning Center	1.08 mi.	1.23 mi.
	Ashley Academy	1.13 mi.	1.82 mi.
	Liberty Bell Middle School	1.3 mi.	1.88 mi.
	Science Hill High School	1.52 mi.	2.38 mi.
Med-Tech Park			
	Woodland Elementary	1.15 mi.	2.28 mi.
	Towne Acres Elementary	0.95 mi.	1.59 mi.
	Ashley Academy	1.31 mi.	1.82 mi.
	Liberty Bell Middle School	1.74 mi.	2.28 mi.
	Science Hill High School	1.56 mi.	2.42 mi.
Northside Hospital Site			
	Fairmont Elementary	1.03 mi.	1.69 mi.
	St. Mary's School	1.14 mi.	1.9 mi.
	Towne Acres Elementary	0.94 mi.	1.27 mi.

Crash and Incident Data

Chief Sirois also provided information regarding crash data and crime incidents for the last two years for the four locations. The Gray Commons site had both the fewest number of crash reports and incident reported (see attached).

	Crash Reports (within ¼ mile)	Incident Reports (within 1000')
2151 Century Lane	219	133
413 Princeton Rd	34	78
203 Gray Commons	9	3
510 Med Tech Pkwy	46	57

Synopsis of city law enforcement research

Executive summary

There were very few, if any, issues with methadone clinics in the polled cities. They are not considered crime magnets. There is little, if any, crime spillage from these clinic sites. There was some opposition in some locations to the clinics, but the concerns have not come to pass.

City highlights

Knoxville Police Department

The clinic follows a stringent process and proper procedure. Law enforcement was invited to tour the facility. There is not much residential area around. The facility has been there about seven years, so there is an established track record. The facility opens at 4:45 a.m. each day, and closes at noon. Traffic might be a concern if it did not open so early. There are security guards on site.

Columbia Police Department

The clinic has been there for about seven years, and there have been no calls for service. No criminal activity can be tied to the clinic. There was controversy in the media as the clinic was being considered, but it subsided. The Police Department had some reservations about the clinic initially, but these were alleviated over time through visits to the clinic. The facility is located in a strip mall.

Dyersburg Police Department

The clinic has been there for at least eight years. Not much resistance from public at the initiation of the clinic. The company met with the Police Department and was very open. There are no issues with the clinic, and no crime that can be attributed or tied to the facility. The clinic opens at about 5:30 a.m., and is packed. There are no traffic crash issues.

Memphis Police Department

There are no apparent problems or influx of crime that can be attributed to the clinics.